

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20544

In the Matter of

Petition to Amend Part 68 of the
Commission's Rules to Include
Terminal Equipment Connected to
Basic Rate Access Services Provided
via Integrated Services Digital
Network Access Technology

and

In the Matter of

Petition to Amend Part 68 of the
Commission's Rules to Include
Terminal Equipment Connected to
Public Switched Digital Service

and

Correction of Part 68 Typographical
Errors, Clarifications and a Proposal
for Part 68 Registration Revocation
Procedures

RECEIVED

FEB 25 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

CC Docket No. 93-268

RM 7815

RM 6147

NYNEX'S REPLY COMMENTS

The NYNEX Telephone Companies ("NYNEX")¹ respectfully submit these Reply Comments in the above-captioned matter.

In its Comments, NYNEX supported the proposed amendments to Part 68 of the Commission's rules. The proposed amendments were also supported by most of the commenting parties. As noted by U S WEST in its Comments,² the proposed amendments are fully justified on

¹ The NYNEX Telephone Companies are New York Telephone Company and New England Telephone and Telegraph Company.

² See U S WEST Comments, p.2.

the basis of sound engineering practice.

Several parties (i.e., TIA and AT&T) proposed further revisions to the rules in their comments. NYNEX supports these revisions as well. However, NYNEX opposes AT&T's request to include a definition of Public Switched Digital Service (PSDS) in Part 68.³ Inclusion of such a definition is well beyond the scope and purpose of Part 68.⁴

NYNEX also agrees with the TIA that the Commission needs to streamline the Part 68 rulemaking process.⁵ The existing process for rule revisions can at times be very lengthy. In fact, as TIA points out in its Comments,⁶ a portion of this particular proceeding was initiated nearly six years ago. In today's competitive environment, it is critical that local exchange carriers be able to introduce new services in a timely manner.

NYNEX does not support IDCMA's proposal that the Commission specify a standard plug for network interconnection of PSDS and ISDN equipment. The Commission should not specify in the Part 68 Rules the types of connectors to be used with specific services. Instead,

³ See AT&T Comments, p.3.

⁴ The purpose of the Part 68 rules is to provide "uniform standards for the protection of the telephone network from harms caused by the connection of terminal equipment and associated wiring." See 47 CFR §68.1. NYNEX agrees with BellSouth that the Commission must be careful that Part 68 proceedings remain concerned with protection against network harms and do not become tools for affecting the function of the CPE marketplace. See BellSouth Comments, pp. 3-4.

⁵ See NYNEX Comments p.5 n.9.

⁶ See TIA Comments p.2.

as WYNEX and others noted in their Comments,⁷ such matters should be left to standards bodies, industry forums, the tariff process and the marketplace.

CONCLUSION

The Commission should adopt the proposed amendments to Part 68, including the modifications proposed by TIA and AT&T. However, the Commission should not specify in the Part 68 rules the particular requirements for network interconnection of ISDN and PSDS terminal equipment. Instead the Commission should rely on standards committees, the tariff/technical specification process and industry consensus to determine these requirements.

Respectfully submitted,

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and
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Dated: February 25, 1994

⁷ See WYNEX Comments p.4 n.6; BellSouth Comments, p.4.

CERTIFICATE OF SERVICE

I certify that copies of the foregoing NYNEX'S REPLY COMMENTS, CC Docket No. 93-268, RM 7815, RM 6147 were served on each of the parties listed on the attached Service List, this 25th day of February, 1994, by first class United States mail, postage prepaid.



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